

EXHIBIT F

1 Scott R. Mosko (State Bar No. 106070)
2 FINNEGAN, HENDERSON, FARABOW,
3 GARRETT & DUNNER, L.L.P.
4 Stanford Research Park
5 3300 Hillview Avenue
6 Palo Alto, California 94304
7 Telephone: (650) 849-6600
8 Facsimile: (650) 849-6666

9
10 Attorneys for Defendants
11 Connectu LLC, Cameron Winklevoss,
12 Tyler Winklevoss, Howard Winklevoss,
13 and Divya Narendra

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

THE FACEBOOK, INC.

Plaintiff,

v.

CONNECTU LLC, CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, HOWARD
WINKLEVOSS, DIVYA NARENDRA, AND
DOES 1-25,

Defendants.

CASE NO. 105 CV 047381

**SECOND AMENDED RESPONSE OF
DEFENDANT CONNECTU LLC TO
PLAINTIFFS FIRST SET OF SPECIAL
INTERROGATORIES (1-23)**

1 **PROPOUNDING PARTY:** **Plaintiff THEFACEBOOK, INC.**

2 **RESPONDING PARTY:** **Defendant CONNECTU LLC**

3 **SET NO.:** **ONE (1)**

4
5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 The above-named party hereby responds, pursuant to California Code of Civil Procedure
7 Section 2030.210(a), to the first set of interrogatories as follows:

8 **GENERAL OBJECTIONS**

9 1. Responding party objects to each interrogatory and to the definitions and instructions to
10 the extent they seek to impose obligations that are broader than or inconsistent with the California
11 Code of Civil Procedure and applicable Local Rules or court orders.

12 2. Responding party objects to each interrogatory, and to the definitions and instructions to
13 the extent they seek the disclosure of information protected by the attorney-client privilege, attorney
14 work-product doctrine, or any other applicable privilege or protection, as provided by any applicable
15 law. Responding party does not intend to produce such privileged or protected documents or
16 information, and the inadvertent disclosure of such is not to be deemed a waiver of any privilege.
17 Responding party expressly reserves the right to object to the introduction at trial or any other use of
18 such information that may be inadvertently disclosed. In addition, Responding party objects to the
19 interrogatories and all definitions and instructions to the extent they seek and/or require Responding
20 party to produce a privilege log for documents or information falling within the attorney-client
21 privilege or work-product doctrine, if such documents or information were created after the date that
22 this lawsuit was filed.

23 3. Responding party objects to each interrogatory and all other definitions and instructions
24 to the extent they are vague, overly broad, unduly burdensome, exceed the boundaries of
25 discoverable information, or fail to describe the information sought with the required reasonable
26 particularity.

27 4. Responding party objects to each interrogatory and all definitions and instructions to the
28 extent the burden or expense of the proposed discovery outweighs its likely benefit, given the needs

1 of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in
2 the litigation, and the importance of the proposed discovery in resolving the issues.

3 5. Responding party objects to each interrogatory and all other definitions and instructions
4 to the extent they seek information that is confidential financial, proprietary, trade secret or other
5 confidential or competitively sensitive business information relating to Responding party or any
6 third party. Responding party reserves the right to object that certain information is so confidential
7 and sensitive that it will not be produced even pursuant to a protective order.

8 6. Responding party objects to each interrogatory and all definitions and instructions to the
9 extent they seek information not in Responding Party's custody or control.

10 7. Responding party objects to the interrogatory and all other definitions and instructions to
11 the extent they seek information that is beyond the scope of this litigation, is not relevant, or that
12 falls outside the parameters of discoverable information under the California Code of Civil
13 Procedure.

14 8. Responding party has not yet completed its investigation, collection of information,
15 discovery, and analysis relating to this action. The following response is based on information
16 known and available to Responding party at this time. Responding party reserves the right to
17 modify, change, or supplement its response and to produce additional evidence at trial.

18 9. Responding party's agreement to furnish information in response to Plaintiff's
19 interrogatories shall not be deemed as an admission regarding the relevance of the requested
20 information, nor is it intended to waive any right to object the admissibility of such at trial.

21 10. Responding party objects to producing at this time documents unrelated to the issue of
22 personal jurisdiction over the individual Defendants.

23 24 **OBJECTIONS TO DEFINITIONS**

25 1. Responding party objects to all definitions to the extent they impose burdens on
26 responding different or greater than those provided in the California Code of Civil Procedure.

27 2. Responding party objects to all definitions to the extent that they are burdensome,
28 oppressive and unnecessary.

RESPONSES AND SPECIFIC OBJECTIONS

1. ConnectU incorporates its initial response and objections and its first amended response herein to this second amended response. In addition, ConnectU responds as follows: ConnectU affirms that a reasonable inquiry has been made in effort to respond to this Interrogatory. ConnectU has produced copies of communications its members have had with individuals or entities ConnectU reasonably believes might have been located in California at the time of the communication. Copies of these communications were produced as CUCA000001 - CUCA000227. ConnectU also identifies the following documents from the Massachusetts case document production as communications its members have had with individuals or entities that could be residents of or located in California: C003883-84; C004511; C004515-16; C006379; C006488; C006493-532; C006633-34; C006722-25; C006733-35; C006741-46; C006750; C006782-84; C006973; C007123-27; C007129-30; C007137; C007375-78; C007393-94; C007403; C007488-89; C008544-45; C008676-77; C008872-73; C008948-51; C008990-92; C008996-98; C009000-02; C009007-09; C009011-25; C009168-69; C009386; C009389-90; C009395-96; C009403-08; C009613; C010181; C010325-26; C010368-70; C010639; C010643; C010662; C010664; C010667; C010710-11. With respect to e-mail communications, ConnectU has produced copies of all such communications in its possession which include the recipient or sender's address, telephone number and/or extension referencing California. ConnectU does not represent or understand however that any recipient or sender of an e-mail communication referenced above is or was a California resident at the time such communication occurred. ConnectU has no way of knowing the actual residence of these senders or recipients.

11. ConnectU incorporates its initial response and objections and its first amended response herein to this second amended response. In addition, ConnectU responds as follows: connectu.com is a free networking website for college students, faculty, and alumni. ConnectU provides a platform to connect users at colleges and universities. Users can interact in order to share information, discuss classes, plan events, purchase items, and network. The connectu.com website provides an interface where users have a personal profile where they can upload photographs and provide information about themselves such as hobbies, sports, political views, music, ethnic

1 background, and general interests, so that others can search for people having those characteristics.
2 Services include a chat feature, discussion groups, as well as an address book.

3 14. ConnectU incorporates its initial response and objections and its first amended
4 response herein to this second amended response. In addition, ConnectU responds as follows:
5 Members of ConnectU include Cameron Winklevoss, Tyler Winklevoss, Howard Winklevoss, and
6 Divya Narendra, as set forth in the Limited Liability Company Operating Agreement recited in the
7 Interrogatory ("Operating Agreement") and found at bates numbers C011285 through C011335.
8 These persons have all been Members since ConnectU was formed. Cameron Winklevoss, Howard
9 Winklevoss, and Maria Antonelli are Managers of ConnectU and together form the Board of
10 Managers. They have been Managers since ConnectU was formed. Tyler Winklevoss is a successor
11 Manager of ConnectU as set forth at section 8.1(c)(2) of the Operating Agreement at bates number
12 C011311. He has been successor Manager since ConnectU was formed. Members and Managers of
13 ConnectU have the duties, job descriptions, authorities, and responsibilities set forth in the Operating
14 Agreement. For example, as set forth at section 8.1(a), each of the Managers "shall have the
15 exclusive right, power and authority to manage the Business, assets, operation and affairs of the
16 Company, with all rights and powers and the full power necessary, desirable or convenience to
17 administer and operate the same for Company purposes, to incur, perform, satisfy and compromise
18 all manner of obligations on behalf of the Company, and to make all decisions and do all things
19 necessary or desirable in connection therewith." In addition to the other duties set forth in the
20 Operating Agreement, Cameron Winklevoss' and Tyler Winklevoss' duties include overseeing the
21 operation of the connectu.com website, including communicating development activities on the site.

22 15. ConnectU incorporates its initial response and objections and its first amended
23 response herein to this second amended response. In addition, ConnectU responds as follows:
24 ConnectU has not conducted any advertising, promotions and marketing activities specifically
25 directed at California residents. ConnectU has responded to an individual who may have been a
26 resident of California about advertising opportunities on the connectu.com site. This email to an
27 individual having a .edu email address associated with a California-based university was produced at
28 C010664. Specific marketing or advertising activities include the creation of an amazon gift

1 certificate program, a program allowing advertisers to purchase adspace, participation in google
2 adwords, and participation in Applestore's linkshare program.

3 18. ConnectU incorporates its initial response and objections and its first amended
4 response herein to this second amended response. In addition, ConnectU responds as follows:
5 Cameron Winklevoss and Tyler Winklevoss contributed approximately \$10,000 to ConnectU in
6 combination. Howard Winklevoss contributed approximately \$300,000 to \$400,000 to ConnectU.
7 Divya Narendra contributed approximately \$10,000 to ConnectU. As set forth in Schedule A of the
8 Limited Liability Company Operating Agreement of ConnectU, LLC - bates numbers C011285
9 through 011335, the following individuals own Equity Units in ConnectU: Cameron Winklevoss
10 (47); Tyler Winklevoss (47); Howard Winklevoss (1); and Divya Narendra (5). As set forth in
11 Schedule A of the Limited Liability Company Operating Agreement of ConnectU, LLC - bates
12 numbers C011285 through 011335, the Percentage Interest of ownership of ConnectU is as follows:
13 Cameron Winklevoss (47%); Tyler Winklevoss (47%); Howard Winklevoss (1%); and Divya
14 Narendra (5%).

15 19. ConnectU incorporates its initial response and objections and its first amended
16 response herein to this second amended response. In addition, ConnectU responds as follows: the
17 principal office of ConnectU is at 500 W. Putnam Ave, Greenwich, CT 06830. ConnectU rents
18 servers that are co-located by Pacific Northwest Software. ConnectU does not know the address of
19 the co-location facility. There are no other offices, facilities or equipment locations.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

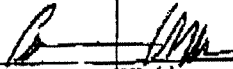
26 ///

27 ///

28 ///

VERIFICATION

I, Cameron Winklevoss am a member of ConnectU LLC, defendant in the above titled action. I have read the second amended responses to Plaintiff's First Set of Interrogatories. I am informed and believed that these responses are true and correct to the best of my knowledge. I declare under penalty of perjury that the foregoing is true and correct and that this verification was executed on the 5 day of March 2006.


Cameron Winklevoss

1 Scott R. Mosko (State Bar No. 106070)
2 FINNEGAN, HENDERSON, FARABOW,
3 GARRETT & DUNNER, L.L.P.
4 Stanford Research Park
5 3300 Hillview Boulevard
6 Palo Alto, California 94304
7 Telephone: (650) 849-6600
8 Facsimile: (650) 849-6666
9

10 Attorneys for Defendants
11 Connectu LLC, Cameron Winklevoss,
12 Tyler Winklevoss, Howard Winklevoss,
13 and Divya Narendra
14

15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000
1001
1002
1003
1004
1005
1006
1007
1008
1009
1010
1011
1012
1013
1014
1015
1016
1017
1018
1019
1020
1021
1022
1023
1024
1025
1026
1027
1028
1029
1030
1031
1032
1033
1034
1035
1036
1037
1038
1039
1040
1041
1042
1043
1044
1045
1046
1047
1048
1049
1050
1051
1052
1053
1054
1055
1056
1057
1058
1059
1060
1061
1062
1063
1064
1065
1066
1067
1068
1069
1070
1071
1072
1073
1074
1075
1076
1077
1078
1079
1080
1081
1082
1083
1084
1085
1086
1087
1088
1089
1090
1091
1092
1093
1094
1095
1096
1097
1098
1099
1100
1101
1102
1103
1104
1105
1106
1107
1108
1109
1110
1111
1112
1113
1114
1115
1116
1117
1118
1119
1120
1121
1122
1123
1124
1125
1126
1127
1128
1129
1130
1131
1132
1133
1134
1135
1136
1137
1138
1139
1140
1141
1142
1143
1144
1145
1146
1147
1148
1149
1150
1151
1152
1153
1154
1155
1156
1157
1158
1159
1160
1161
1162
1163
1164
1165
1166
1167
1168
1169
1170
1171
1172
1173
1174
1175
1176
1177
1178
1179
1180
1181
1182
1183
1184
1185
1186
1187
1188
1189
1190
1191
1192
1193
1194
1195
1196
1197
1198
1199
1200
1201
1202
1203
1204
1205
1206
1207
1208
1209
1210
1211
1212
1213
1214
1215
1216
1217
1218
1219
1220
1221
1222
1223
1224
1225
1226
1227
1228
1229
1230
1231
1232
1233
1234
1235
1236
1237
1238
1239
1240
1241
1242
1243
1244
1245
1246
1247
1248
1249
1250
1251
1252
1253
1254
1255
1256
1257
1258
1259
1260
1261
1262
1263
1264
1265
1266
1267
1268
1269
1270
1271
1272
1273
1274
1275
1276
1277
1278
1279
1280
1281
1282
1283
1284
1285
1286
1287
1288
1289
1290
1291
1292
1293
1294
1295
1296
1297
1298
1299
1300
1301
1302
1303
1304
1305
1306
1307
1308
1309
1310
1311
1312
1313
1314
1315
1316
1317
1318
1319
1320
1321
1322
1323
1324
1325
1326
1327
1328
1329
1330
1331
1332
1333
1334
1335
1336
1337
1338
1339
1340
1341
1342
1343
1344
1345
1346
1347
1348
1349
1350
1351
1352
1353
1354
1355
1356
1357
1358
1359
1360
1361
1362
1363
1364
1365
1366
1367
1368
1369
1370
1371
1372
1373
1374
1375
1376
1377
1378
1379
1380
1381
1382
1383
1384
1385
1386
1387
1388
1389
1390
1391
1392
1393
1394
1395
1396
1397
1398
1399
1400
1401
1402
1403
1404
1405
1406
1407
1408
1409
1410
1411
1412
1413
1414
1415
1416
1417
1418
1419
1420
1421
1422
1423
1424
1425
1426
1427
1428
1429
1430
1431
1432
1433
1434
1435
1436
1437
1438
1439
1440
1441
1442
1443
1444
1445
1446
1447
1448
1449
1450
1451
1452
1453
1454
1455
1456
1457
1458
1459
1460
1461
1462
1463
1464
1465
1466
1467
1468
1469
1470
1471
1472
1473
1474
1475
1476
1477
1478
1479
1480
1481
1482
1483
1484
1485
1486
1487
1488
1489
1490
1491
1492
1493
1494
1495
1496
1497
1498
1499
1500
1501
1502
1503
1504
1505
1506
1507
1508
1509
1510
1511
1512
1513
1514
1515
1516
1517
1518
1519
1520
1521
1522
1523
1524
1525
1526
1527
1528
1529
1530
1531
1532
1533
1534
1535
1536
1537
1538
1539
1540
1541
1542
1543
1544
1545
1546
1547
1548
1549
1550
1551
1552
1553
1554
1555
1556
1557
1558
1559
1560
1561
1562
1563
1564
1565
1566
1567
1568
1569
1570
1571
1572
1573
1574
1575
1576
1577
1578
1579
1580
1581
1582
1583
1584
1585
1586
1587
1588
1589
1590
1591
1592
1593
1594
1595
1596
1597
1598
1599
1600
1601
1602
1603
1604
1605
1606
1607
1608
1609
1610
1611
1612
1613
1614
1615
1616
1617
1618
1619
1620
1621
1622
1623
1624
1625
1626
1627
1628
1629
1630
1631
1632
1633
1634
1635
1636
1637
1638
1639
1640
1641
1642
1643
1644
1645
1646
1647
1648
1649
1650
1651
1652
1653
1654
1655
1656
1657
1658
1659
1660
1661
1662
1663
1664
1665
1666
1667
1668
1669
1670
1671
1672
1673
1674
1675
1676
1677
1678
1679
1680
1681
1682
1683
1684
1685
1686
1687
1688
1689
1690
1691
1692
1693
1694
1695
1696
1697
1698
1699
1700
1701
1702
1703
1704
1705
1706
1707
1708
1709
1710
1711
1712
1713
1714
1715
1716
1717
1718
1719
1720
1721
1722
1723
1724
1725
1726
1727
1728
1729
1730
1731
1732
1733
1734
1735
1736
1737
1738
1739
1740
1741
1742
1743
1744
1745
1746
1747
1748
1749
1750
1751
1752
1753
1754
1755
1756
1757
1758
1759
1760
1761
1762
1763
1764
1765
1766
1767
1768
1769
1770
1771
1772
1773
1774
1775
1776
1777
1778
1779
1780
1781
1782
1783
1784
1785
1786
1787
1788
1789
1790
1791
1792
1793
1794
1795
1796
1797
1798
1799
1800
1801
1802
1803
1804
1805
1806
1807
1808
1809
1810
1811
1812
1813
1814
1815
1816
1817
1818
1819
1820
1821
1822
1823
1824
1825
1826
1827
1828
1829
1830
1831
1832
1833
1834
1835
1836
1837
1838
1839
1840
1841
1842
1843
1844
1845
1846
1847
1848
1849
1850
1851
1852
1853
1854
1855
1856
1857
1858
1859
1860
1861
1862
1863
1864
1865
1866
1867
1868
1869
1870
1871
1872
1873
1874
1875
1876
1877
1878
1879
1880
1881
1882
1883
1884
1885
1886
1887
1888
1889
1890
1891
1892
1893
1894
1895
1896
1897
1898
1899
1900
1901
1902
1903
1904
1905
1906
1907
1908
1909
1910
1911
1912
1913
1914
1915
1916
1917
1918
1919
1920
1921
1922
1923
1924
1925
1926
1927
1928
1929
1930
1931
1932
1933
1934
1935
1936
1937
1938
1939
1940
1941
1942
1943
1944
1945
1946
1947
1948
1949
1950
1951
1952
1953
1954
1955
1956
1957
1958
1959
1960
1961
1962
1963
1964
1965
1966
1967
1968
1969
1970
1971
1972
1973
1974
1975
1976
1977
1978
1979
1980
1981
1982
1983
1984
1985
1986
1987
1988
1989
1990
1991
1992
1993
1994
1995
1996
1997
1998
1999
2000
2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
2023
2024
2025
2026
2027
2028
2029
2030
2031
2032
2033
2034
2035
2036
2037
2038
2039
2040
2041
2042
2043
2044
2045
2046
2047
2048
2049
2050
2051
2052
2053
2054
2055
2056
2057
2058
2059
2060
2061
2062
2063
2064
2065
2066
2067
2068
2069
2070
2071
2072
2073
2074
2075
2076
2077
2078
2079
2080
2081
2082
2083
2084
2085
2086
2087
2088
2089
2090
2091
2092
2093
2094
2095
2096
2097
2098
2099
2100
2101
2102
2103
2104
2105
2106
2107
2108
2109
2110
2111
2112
2113
2114
2115
2116
2117
2118
2119
2120
2121
2122
2123
2124
2125
2126
2127
2128
2129
2130
2131
2132
2133
2134
2135
2136
2137
2138
2139
2140
2141
2142
2143
2144
2145
2146
2147
2148
2149
2150
2151
2152
2153
2154
2155
2156
2157
2158
2159
2160
2161
2162
2163
2164
2165
2166
2167
2168
2169
2170
2171
2172
2173
2174
2175
2176
2177
2178
2179
2180
2181
2182
2183
2184
2185
2186
2187
2188
2189
2190
2191
2192
2193
2194
2195
2196
2197
2198
2199

1 I, Cameron Winklevoss am a member of and currently on the Board of Managers of
2 ConnectU LLC. I make this declaration in response to the Court's Order, dated February 17, 2006.

3 On behalf of ConnectU, I was responsible for reviewing and drafting the responses to
4 Plaintiff The FaceBook Inc.'s First Set of Requests for Production of Documents ("Discovery"). I
5 am the ConnectU representative regarding this Discovery. I have made a diligent search and
6 reasonable inquiry for the purpose of locating documents responsive to this Discovery and have
7 forwarded such documents to my counsel. My specific responses to the Requests are as follows:

8 1. Regarding Request No. 1, after a diligent search, no such documents exist.

9 2. Regarding Request No. 2, I understand that discovery requests concerning
10 ConnectU users has been denied.

11 3. Regarding Request No. 3, after a diligent search, no such documents exist.

12 4. Regarding Request No. 4, after a diligent search, no such documents exist.

13 5. Regarding Request No. 5, after a diligent search, no such documents exist.

14 6. Regarding Request No. 6, after a diligent search all documents regarding the
15 organizational structure of ConnectU were previously produced in the Massachusetts litigation.

16 Their production numbers are: C002825-31; C004101; C004562-67; C006789-90; C006818;
17 C008043; C009718; C011104; C011105; C011106; C011107; C011108; C011109; C011110;
18 C011111; C011112; C011113; C011114; C011115; C011116; C011117; C011144-89; C011190-
19 236; C011237-84; C011285-335; C011336; and C011337. There are no documents that relate to
20 both the Winklevoss Companies and ConnectU.

21 7. Regarding Request No. 7, after a diligent search all corporate records
22 concerning ConnectU were previously produced in the Massachusetts litigation. Their production
23 numbers are: C002825-31; C004101; C004562-67; C006789-90; C006818; C008043; C009718;
24 C011104; C011105; C011106; C011107; C011108; C011109; C011110; C011111; C011112;
25 C011113; C011114; C011115; C011116; C011117; C011144-89; C011190-236; C011237-84;
26 C011285-335; C011336; and C011337. There are no documents that relate to both the Winklevoss
27 Companies and ConnectU.
28

1 8. Regarding Request No. 8, after a diligent search there are no financial reports,
2 profit/loss statements or loan documents concerning ConnectU. There are no documents that relate
3 to both the Winklevoss Companies and ConnectU.

4 9. Regarding Request No. 9, after a diligent search all documents regarding the
5 communications between ConnectU and companies or persons in California, ConnectU states that it
6 cannot confirm whether any such communications occurred. In the Massachusetts litigation,
7 ConnectU produced copies of many communications, mostly in the form of e-mails that reflected a
8 recipient or sender who identified a California address and/or telephone number. Their production
9 numbers are: C003883-84; C004511; C004515-16; C006379; C006488; C006493-532; C006633-
10 34; C006722-25; C006733-35; C006741-46; C006750; C006782-84; C006973; C007123-27;
11 C007129-30; C007137; C007375-78; C007393-94; C007403; C007488-89; C008544-45; C008676-
12 77; C008872-73; C008948-51; C008990-92; C008996-98; C009000-02; C009007-09; C009011-25;
13 C009168-69; C009386; C009389-90; C009395-96; C009403-08; C009613; C010181; C010325-26;
14 C010368-70; C010639; C010643; C010662; C010664; C010667; and C010710-11. In this
15 litigation, ConnectU has produced copies of all remaining communications that reflected a recipient
16 or sender who identified a California address and/or telephone number. Their production numbers
17 are CUCA00001 - CACU000227.

18 10. Regarding Request No. 10, I understand that discovery requests concerning
19 ConnectU users has been denied.

20 11. Regarding Request No. 11, after a diligent search, ConnectU does not have
21 any account receivable due from a California resident.

22 12. Regarding Request No. 12, after a diligent search, ConnectU does not have
23 any personal or real property in California.

24 13. Regarding Request No. 13, after a diligent search, ConnectU does not have
25 any contracts in which California law governs.

26 14. Regarding Request No. 14, while the word "access" is vague and uncertain,
27 after a diligent search, ConnectU has produced in the Massachusetts litigation all known documents
28 it believes are responsive to this request. The production numbers of these documents are:

1 C003282; C004043; C004225; C004235; C004243; C006535-36; C006537; C006538-40; C006711-
2 12; C008023; C008531; C008657; C008658; C008669; C008670; C008673; C008674; C008675;
3 C008691; C008810; C008811-19; C008835; C008848; C008954; C008957; C008959; C008962;
4 C008963; C008964-65; C009611-12; C010359; C010360-63; C010364; C010365; C010446;
5 C010447; C010448; C011005; C011038; C011039-40; C011093; and C011097.

6 15. Regarding Request No. 15, after a diligent search, ConnectU hereby produces
7 documents that are bates stamped CUCA00228 - CUCA02960.

8 16. Regarding Request No. 16, after a diligent search, ConnectU does not have
9 any licenses or registrations regarding the ability to do business in California.

10 17. Regarding Request No. 17, I understand that discovery requests concerning
11 ConnectU users has been denied.

12 18. Regarding Request No. 18, after a diligent search, all formation records of
13 ConnectU were previously produced in the Massachusetts litigation. Their production numbers are:
14 C002825-31; C004101; C004562-67; C006789-90; C006818; C008043; C009718; C011104;
15 C011105; C011106; C011107; C011108; C011109; C011110; C011111; C011112; C011113;
16 C011114; C011115; C011116; C011117; C011144-89; C011190-236; C011237-84; C011285-335;
17 C011336; and C011337.

18 19. Regarding Request No. 19, after a diligent search, all documents concerning
19 ConnectU's directors, officers, employees and agents as their activities concerned ConnectU were
20 previously produced in the Massachusetts litigation. Their production numbers are: C002825-31;
21 C004101; C004562-67; C006789-90; C006818; C008043; C009718; C011104; C011105; C011106;
22 C011107; C011108; C011109; C011110; C011111; C011112; C011113; C011114; C011115;
23 C011116; C011117; C011144-89; C011190-236; C011237-84; C011285-335; C011336; and
24 C011337.

25 20. Regarding Request No. 20, after a diligent search, ConnectU produced copies
26 of many documents that might reflect marketing activities in California. Their production numbers
27 are: C003883-84; C004515-16; C006973; C007137; C007403; C008544; C008948-51; C009011-
28 25; C009168-69; C009389; C010368-70; C010639; C010662; and C010664. In this litigation,

1 ConnectU has produced copies of all remaining communications that might reflect marketing
2 activities in California. Their production numbers are CUCA00001 - CACU000227.

3 21. Regarding Request No. 21, after a diligent search for all documents regarding
4 California people or entities with whom ConnectU had a relationship, ConnectU states that it cannot
5 confirm whether any such relationship existed. In the Massachusetts litigation, ConnectU produced
6 copies of many communications, mostly in the form of e-mails that reflected a recipient or sender
7 who identified a California address and/or telephone number. Their production numbers are:
8 C003883-84; C004511; C004515-16; C006379; C006488; C006493-532; C006633-34; C006722-25;
9 C006733-35; C006741-46; C006750; C006782-84; C006973; C007123-27; C007129-30; C007137;
10 C007375-78; C007393-94; C007403; C007488-89; C008544-45; C008676-77; C008872-73;
11 C008948-51; C008990-92; C008996-98; C009000-02; C009007-09; C009011-25; C009168-69;
12 C009386; C009389-90; C009395-96; C009403-08; C009613; C010181; C010325-26; C010368-70;
13 C010639; C010643; C010662; C010664; C010667; and C010710-11. In this litigation, ConnectU
14 has produced copies of all remaining communications that reflected a recipient or sender who
15 identified a California address and/or telephone number. Their production numbers are
16 CUCA00001 - CACU000227.

17 22. Regarding Request No. 22, after a diligent search, all documents concerning
18 the ownership and investments in and of ConnectU were produced in the Massachusetts litigation.
19 Their production numbers are: C002858-59; C004101; C006773; C006789-90; C008548; C009661;
20 C009662; C010168-69; C010173; C010174-75; C010246; C010291-92; C010296; C010308;
21 C010314; C011144-89; C011190-236; C011237-84; C011285-335; C011336; and C011337.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on the 3 day of March, 2006.


Cameron Winklevoss

1 Scott R. Mosko (State Bar No. 106070)
FINNEGAN, HENDERSON, FARABOW,
2 GARRETT & DUNNER, L.L.P.
Stanford Research Park
3 3300 Hillview Avenue
Palo Alto, California 94304
4 Telephone: (650) 849-6600
Facsimile: (650) 849-6666
5

6 Attorneys for Defendant ConnectU, LLC
7
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SANTA CLARA

11 THEFACEBOOK, INC.

12 Plaintiff,

13 v.
14

15 CONNECTU LLC, CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, HOWARD
16 WINKLEVOSS, DIVYA NARENDRA, AND
DOES 1-25,

17 Defendants.
18
19
20
21
22
23
24
25
26
27
28

CASE NO. 105 CV 047381

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I am a citizen of the United States, over the age of 18 years, and not a party to this action.

My place of employment and business address is Finnegan, Henderson, Farabow, Garrett, & Dunner, L.L.P., 3300 Hillview Avenue, Palo Alto, California 94304. On March 9, 2006, I caused a copy of the following documents to be served:

- **DECLARATION OF CONNECTU**
- **AMENDED RESPONSE OF DEFENDANT CAMERON WINKLEVOSS TO PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES (1-23)**
- **AMENDED RESPONSE OF DEFENDANT HOWARD WINKLEVOSS TO PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES (1-23)**
- **AMENDED RESPONSE OF DEFENDANT TYLER WINKLEVOSS TO PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES (1-23)**
- **AMENDED RESPONSE OF DEFENDANT DIVYA NARENDRA TO PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES (1-23)**
- **SECOND AMENDED RESPONSE OF DEFENDANT CONNECTU TO PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES (1-23)**

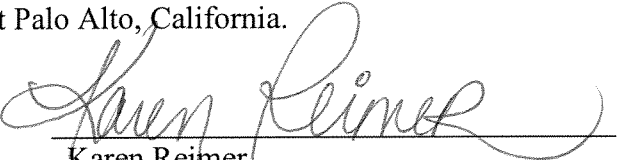
to be served on all parties as follows:

Attorneys for Plaintiff
 Joshua H. Walker, Esq.
 Monte Cooper, Esq.
 ORRICK, HERRINGTON & SUTCLIFFE LLP
 1000 Marsh Road
 Menlo Park, CA 94025
 Telephone: 650.614.7400
 Facsimile: 650.614.7401

- | | |
|-------------------------------------|-----------------------|
| <input checked="" type="checkbox"/> | Via First Class Mail |
| <input type="checkbox"/> | Via Hand Delivery |
| <input type="checkbox"/> | Via Overnight Courier |
| <input type="checkbox"/> | Via Facsimile |

I am readily familiar with my firm's practice for collection and processing correspondence for mailing with the United States Postal Service, to wit, that correspondence be deposited with the United States Postal Service this same day in the ordinary course of business. I sealed said envelope and placed it for collection at our business offices on March 9, 2006, following ordinary business practice.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct. Executed on March 9, 2006, at Palo Alto, California.

3
4 
Karen Reimer